1631210006-ST. Clair Co. monsanto W.G. Krummrich 160000802702

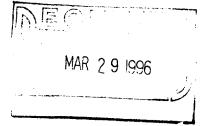
Financial Filo

Monsanto

147835

Monsanto Company 800 N. Lindbergh Boulevard St. Louis, Missouri 63167 Phone: (314) 694-1000

March 28, 1996



Director
Illinois Environmental Protection Agency
Financial Assurance Permit Section
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62794-9276

Gentlemen:

Enclosed is Monsanto Company's letter to demonstrate financial responsibility for liability coverage and closure and post-closure costs, which has been signed by the Chief Financial Officer. Also enclosed is a copy of Monsanto's Annual Report and the special report from the independent certified public accountants.

Please contact me (telephone 314-694-7173) if you have additional questions regarding the financial requirements. Other questions should be referred to Mr. Garth F. Fort (telephone 314-694-8886).

Sincerely,

C. V. Thompson

Financial Accounting Mgr. - Environment, Safety & Health

Enclosure

cc: Mr. P. C. Wright

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Director Illinois Environmental Protection Agency 2200 Churchill Road P.O. Box 19276 Springfield, Illinois 62794-9276
Dear Sir or Madam:
I am the chief financial officer of Monsanto Company, 800 N. Lindbergh Blvd., St. Louis, MO 6316
This letter is in support of the use of the financial test to demonstrate financial responsibility for liability
coverage and closure and/or post-closure care as specified in Subpart H of 35 Ill. Adm. Code Parts
724 and 725.
The firm identified above is the owner or operator of the following facilities for which liability coverage
for sudden and nonsudden accidental occurrences is being demonstrated through
the financial test specified in Subpart H of 35 Ill. Adm. Code 724 and 725.
Please attach a separate page if more space is needed for all facilities.
USEPA I.D. NoIL D 000802702
(4)
Name W. G. Krummrich Plant
Address Route 3
Address
City Sauget, IL 62201
(7)
The firm identified above guarantees, through the guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724
and 725, liability coverage for <u>sudden and nonsudden</u> accidental occurences at the
following facilities owned or operated by the following:
USEPA I.D. No
(4)
NameNONE
(5)
Address
City
(7)
USEPA I.D. No.
(4)
Name
Addross
Address
City
(7)

The Agency is authorized to require, pursuant to Illinois Revised Statutes 1983. Chapter 11: 1/2. Paragraphs 1021(d) and 1021.1, that this information be submitted to the Agency by any person conducting a waste disposal operation. Failure to provide this information or falsification of this information may result in a civil penalty of not to exceed \$10,000 and an additional civil penalty not to exceed \$1,000 per day of violation, and a fine not to exceed \$1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center.

IL 532 1602 LPC 261 REV 01/90

The firm identified above is the direct of	or urguer-cret bareur con	9)	OWITET OT
operator.			
 The firm identified above owns or operat or post-closure care or liability covera of 35 Ill. Adm. Code Parts 724 and 725. the test are shown for each facility: 	ge is demonstrated through the	financial test speci	fied in Subpart
(Please attach a separate page if more s USEPA I.D. NoIL_D000802702	pace is needed.) Closure Amount	Post-Closure Amount	Closure and Post-Closur Amount
Monsanto Company (4)		(Dollars In Th	
Name W. G. Krummrich Plant			
(5)			
Address Route 3	\$412	\$0	\$412
(0)		(10)	
city Sauget, IL 62201			
(7)			
	Closure	Post-Closure	Closure and Post-Closure
USEPA I.D. No(4)	Amount	<u>Amount</u>	Amount
Name(5)			
Address			
(6)		(10)	
City			
(7)			
 The firm identified above guarantees, the Code Parts 724 and 725, the closure and/o its subsidiaries. The current cost estime each facility: (Please attach a separate page if more specified.) 	or post-closure care of the fol mates for closure or post-closu	lowing facilities ow	ned or operated
	Clasura	Book Classes	Closure and
USEPA I.D. No	Closure <u>Amount</u>	Post-Closure <u>Amount</u>	Post-Closur <u>Amount</u>
(4)			
Name NONE	· · · · · · · · · · · · · · · · · · ·		
(5)			
Address			·····
(6)		(10)	
City			
(1)			
USEPA I.D. No.	Closure	Post-Closure	Closure and Post-Closure
(4)	Amount	Amount	Amount
Name			
(5)			
Address			
(0)		(10)	
City			
(7)			

3. In states where IEPA is not administering the financial 265, this firm is demonstrating financial assurance for facilities through the use of a test equivalent or subs in Subpart H of 40 CFR Parts 264 and 265. The current a test are shown for each facility:	r the closure or stantially equiva	post closure care of lent to the financia	the following litest specified
(Please attach a separate page if more space is needed.	.)		
USEPA I.D. NoAL D 004019048	Closure <u>Amount</u>	Post Closure Amount	Closure and Post Closure Amount
(+)		(Dollars In	Thousands)
Name Monsanto Company - Anniston Plant			
Address 300 Birmingham Highway	\$0	\$898	\$898
(4)		(10)	
City Anniston, Alabama 36201			
(1)			
	Closure	Post Closure	Closure and Post Closure
USEPA I.D. No. <u>CA D 043555366</u>	Amount	Amount	Amount
Name Monsanto Company - Carson Plant			
Name Honsanto Company - Carson Flant			
Address 2100 East 223rd Street, P.O. Box 4506	\$2,871	\$0	\$2,871
(0)		(10)	
City Carson, California 90745			
See Attachment A (1)			
current closure or post closure cost estimates not cove facility: (Please attach a separate page in more space in needed)		ncial assurance are Post Chosure	shown for each Closure and ירטיי לומיניתי
USEPA I.D. NO. NONE	Amount	Amount	Amount
(÷)			
Name			
Address		(10)	
City			
(7)			
			Closure and
USEPA I.D. No	Closure Amount	Post Closure <u>Amount</u>	Post Closure
(-)	amoune		Amount
Name			
(5)			
Address			
(),)		(, 0)	
City			
(1)			

(Please attach a separate page if more space is needed.)	
USEPA I.D. NoLA D 001700756	Plugging and Abandonment Amount (Dollars In Thousands)
Name Monsanto Company - Luling Plant	
(5)	•
Address P. O. Box 174	\$204
(.,)	(11)
City Luling, Louisiana 70070	
(1)	
USEPA I.D. NoTX D 001700806	Plugging and Abandonment Amoung
(4)	
Name Monsanto Company - Chocolate Bayou Plant	
(5)	
Address <u>P.O. Box 711</u>	\$775
(↓)	(11)
City Alvin, TX 77512	
See Attachment B	
This firm is required to file a Form 10K w	rith the Security and Exchange Commission (SEC) for
the latest fiscal year.	
The fiscal year of this firm ends on December 31	The figures for the following items marked wit
an asterisk are derived from this firm's independently audite	d, year-end financial statements for the latest

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 40 CFR 144. The current closure cost estimates as required by 40 CFR 144.62 or Subpart A of Illinois Administrative Code 704 are shown for each facility.

AV:ts/1029k/22-25

completed fiscal year, ended December 31, 1995

ALTERNATIVE I

1.	Amount of annual aggregate liability co	overage to be demonstrate	d	\$	
*2.	Current assets			\$	
*3.	Current liabilities			\$	***************************************
4.	Not working capital			\$	···-
*5.	Tangible net worth			\$	
*6.	If less than 90% or assets are located	in the U.S., given total	U.S. assets	\$	
				YES	NO
7.	Is line 5 at least \$10 million?				
8.	Is line 4 at least 6 times line 1?				
9.	Is line 5 at least 6 times line 1?		•••••		
10.	Are at least 90% of assets located in t	the U.S.? If not complet	e line 11		
11.	Is line 6 at least 6 times line 1?				
her 24.2	eby certify that the wording of this let il as such regulations were constituted	tter is identical to the son the date shown immedia	wording specified in 35 ately below.	Ill. Adm. (ode
igna	ure				
	(15)				
ine .	(16)				
t1e					
	(17)				
	(18)	*			
		ALTERNATIVE II			
1.	Amount of annual aggregate liability co	overage to be demonstrated	d	\$	
2.	Current bond rating of most recent issu	uance and Name of rating :	service	\$	
3.	Date of issuance of bond		• • • • • • • • • • • • • • • • • • • •	\$	
4.	Date of maturity of bond	•••••	• • • • • • • • • • • • • • • • • • • •	\$	
5.	Tangible net worth			\$	
6.	Total assests in U.S		• • • • • • • • • • • • • • • • • • • •	\$	
				YES	NO
7.	Is line 5 at least \$10 million?		•••••		
8.	Is line 5 at least 6 times line 1? \dots		•••••		
9.	Are at least 90% of assets located in t	he U.S.? If not complete	line 10		
0.	Is line 6 at least 6 times line 1? \dots				
here 24.25	by certify that the wording of this let il as such regulations were constituted	ter is identical to the w on the date shown immedia	vording specified in 35 stely below.	Ill. Adm. C	ode
ignat	ure				
ame	(15)				
	(16)				
tle					
	(17)				

PART B. Closure or Post-Closure Care and Liability Coverage

(18)

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates	\$	
2.	Amount of annual aggregate liability coverage to be demonstrated	\$	
3.	Sum of lines 1 and 2	\$	
*4.	Total liabilities	\$	
* 5.	Tangible net worth	\$	
*6.	Net worth	\$	·
*7.	Current assets	\$	
*8.	Current liabilities	\$	
9.	Net working capital	\$	
*10.	The sum of net income plus depreciation, depletion, and amortization	\$	
*11.	Total assets in U.S	\$	
		YES	NO
12.	Is line 5 at least \$10 million?		
13.	Is line 5 at least 6 times line 3?		
14.	Is line 9 at least 6 times line 3?		
*15.	Are at least 90% of assets located in the U.S.? If not complete line 16		
16.	Is line 11 at least 6 times line 3?		
17.	Is line 4 divided by line 6 less than 2.)?		
18.	Is line 10 divided by line 4 greater than 0.1?		
19.	Is line 7 divided by line 8 greater than 1.5?		
	reby certify that the wording of this letter is identical to the wording specified in 35 251 as such regulations were constituted on the date shown immediately below.	Ill. Adm. (Code
Signa	ature		
N	(15)		
Name	(16)		
Title	2		
	(17)		
Date			

コニュニノ

	ALIEKNATIVE II	(Dollars	in Millions)
1.	Sum of current closure and post-closure cost estimates	. \$	65.6
2.	Amount of annual aggregate liability coverage to be demonstrated	. \$	8.0
3.	Sum of lines 1 and 2	. \$	73.6
4.	Current bond rating of most recent issuance and name of rating service	. \$	Al (Moody's
5.	Date of issuance of bondJune 1, 1995	. \$	
6.	Date of maturity of bondJune 1, 2020	. \$	
* 7.	Tangible net worth	. \$	1,778
8.	Total assets in the U.S	. \$	7,181
		YES	NO
9.	Is line 7 at least \$10 million?	X	
10.	Is line 7 at least 6 times line 3?	X_	
11.	Are at least 90% of assets located in the U.S.? If not complete line 12	·	X
12.	Is line 8 at least 6 times line 3?	X	
24.2	reby certify that the wording of this letter is identical to the wording specified in 151 as such regulations were constituted on the date shown immediately below. (15) Robert B. Hoffman	35 I]]. Ada	n. Code
· · · · · ·	(15)	•	
ritle			
Date	March 25, 1996		
,ale	(18)		

AV:ts/1029k/27-29

Instructions for Completing

LETTER FROM CHIEF FINANCIAL OFFICER Form

(to demonstrate liability coverage or to demonstrate both liability coverage and assurance of closure and/or post-closure)

- 1. Insert the firms name and address including zip code 2. Insert "and closure and/or post closure care "if applicable"
- 3. Insert "sudden" or "nonsudden" or both "sudden or nonsudden"
- Insert USEPA ID Number
 Insert name of facility
- 6. Insert address of facility
- 7. Insert city and zip code
 8. Insert "sudden" or "poss
- Insert "sudden" or "nonsudden" or both "sudden and nonsudden"
- 9. Insert 1 or more (1) The direct or higher tier parent corporation of the owner or operator; (2) owned by the same parent corporation as the parent corporation of the owner or operator, and receiving the following value in consideration of this guarantee (3) engaged in the following substantial business relationship with the owner or _____, and receiving the following value in consideration of operator this guarantee _ . Attach a written description of the business relationship or a copy of the contract establishing such relationships to this letter.
- 10. Insert the amount of closure, post-closure and closure and post closure
- 11. Insert the amount of plugging and abandonment
- 12. Insert is required or is not required
- 13. Insert month, day
- 14. Date
- Fill in Alternative I if the criteria of paragraph (f)(1)(i) of §724.247 or §725.247 are Part A. used. Fill in Alternative II if the criteria of paragraph (f)(1)(ii) of §724.247 or §725.247
- Part B. Fill in Part B if you are using the financial test to demonstrate assurance of both liability coverage and closure or post-closure care. Fill in Alternative I if the criteria of paragraphs (f)(1)(i) of §724.243 or §724.245 and (f)(1)(i) of §724.247 are used or if the criteria of paragraphs (e)(1)(i) of §725.243 or §725.245 and (f)(1)(i) of 725.247 are used. Fill in Alternative II if the criteria of paragraphs (f)(1)(ii) of §724.243 or §724.245 and (f)(1)(ii) of §724.247 are used or if the criteria of paragraphs (e)(1)(ii) or §725.243 or §725.245 and (f)(1)(ii) of §725.247 are used.
- 15. Insert signature
- 16. Type name
- 17. Insert title
- 18. Insert date

AV:ts/1029k/1

Letter From Chief Financial Officer Dated March 25, 1996 Attachment A Illinois Environmental Protection Agency

EPA Facility I.D. No.	Facility	Closure Amount (Dollar	Post- Closure Amount	Closure & Post- Closure Amount sands)
FL D 071951966	Monsanto Company Pensacola Plant P.O. Box 97 Gonzalez, Florida 32560-0097	\$ 5,129	\$5,255	\$10,384
GA D 001700699	Monsanto Company Augusta Plant 1610 Marvin Griffin Road P. O. Box 1473 Augusta, Georgia 30903	1,929(1)	0	1,929(1)
GA D 039046800	Searle Chemical 1750 Lovers Lane Augusta, Georgia 30901	174(3)	0	174 ⁽³⁾
GA D 981237118	The NutraSweet Company 1750 Lovers Lane Augusta, Georgia 30901	561	0	561
IA D 005273594	Monsanto Company Muscatine Plant Wiggins Road R.R. #5 Muscatine, Iowa 52761	13,156 ⁽²⁾	0	13,156(2)
LA D 001700756	Monsanto Company Luling Plant Highway 18 River Road P. O. Box 174 Luling, Louisiana 70070	1,694	4,329(4)	6,023(4)
OH D 004233003	Monsanto Company Port Plastics Plant River Road Addyston, Ohio 45001	752	0	752
PR D 090378225	Searle & Company CARR. 189, KM 2.0 Caguas, Puerto Rico 00625	\$ 184(3)	0	\$ 184(3)
TX D 001700806	Monsanto Company Chocolate Bayou Plant FM Road 2917 Box 711 Alvin, Texas 77512	23,647(5)	3,430	27,077(5)

Includes corrective action costs of \$1,619.

(2) Includes corrective action costs of \$12,000.

(3) Guaranteed by Corporate Guarantee.

(4) Includes corrective action costs of \$2,926.

(5) Training corrective action costs of \$4,924.

⁽⁵⁾ Includes corrective action costs of \$4,224.

Financial Assurance Letter Dated March 25, 1996 Attachment B Illinois Environmental Protection Agency

Facility I.D. No.	Facility	Plugging and Abandonment Amount
		(Dollars in Thousands)
FL D 071951966	Monsanto Company Pensacola Plant P.O. Box 97 Gonzalez, Florida 32560-0097	\$208